



SAN LUIS OBISPO COUNTY

DEPARTMENT OF PLANNING AND BUILDING

VICTOR HOLANDA, AICP
DIRECTOR

November 19, 2008

Clare Laufenberg Gallardo, California Energy Commission

Sent via e-mail to: claufenb@energy.state.ca.us

RE: Response to Draft RETI Phase 1b Report

Dear Ms. Laufenberg Gallardo,

I would like to thank the RETI Coordinating Committee for hosting the 11/12/08 Webinar on RETI's Phase 1B Draft Report on renewable energy. As a county that is actively processing two (soon to be three) solar power plants that propose to collectively generate almost 1,000 megawatts of power, this county is very interested in the results of RETI's efforts. RETI's efforts will help the county as it evaluates potential cumulative environmental and economic effects, as well as get a better sense of the potential for long-term renewable energy development in the Carrizo Plains.

The county land use policies, including our Land Use Ordinance and Energy Element, include a number of policies and regulations that support the development of renewable energy and generally support efforts to develop "green" energy in San Luis Obispo (SLO) county. However, as the draft document partially recognizes, a number of sensitive issues exist in the eastern half of SLO county that must be addressed before the county can consider approving renewable energy power plants. After review of the draft document, we have the following comments:

- 1) With regards to the report's Exclusion areas for the county, it appears the report may have underestimated Category 2 lands (please see attached maps showing prime soils (Class 1 and 2 soils, when irrigated) and Williamson Act lands currently under contract);
- 2) While the county does not have an HCP or other formal designation relating to recognizing the state- and federally-endangered San Joaquin kit fox (SJKF) in the Carrizo Plains area, the county has spent years working with CDFG and The Nature Conservancy to develop a program which specifies habitat values and replacement ratios for development within these areas for the kit fox that covers much of the Carrizo Plains area (see attached map). This program envisioned mitigating for smaller projects (less than 40 acres each in size). As a part of the project-level environmental analysis that this county (and the CEC) will be performing on county solar projects, given their very large size (3 projects = 15 sq. miles), we must address how the three known projects (and possibly the other 19 solar projects referenced in the RETI document) will impact the ability of wildlife (such as the SJKF) to continue to migrate through the Carrizo Plain area.
- 3) Based on the proposed Ausra/Carrizo Solar Farm (thermal) which proposes 177 MW over one square mile, it appears the generally referenced 200 MW plant size over a two square mile area may be low;

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- 4) Please clarify the approach taken for considering water availability for thermal plants. In looking at the assumptions or process used, it appears such plants would need to be within 10 miles of an urban area to have access to treated wastewater. (Section 3.3 of the RETI Environmental Assessment). If this is an important criterion, it would appear that thermal plants would not be supported in this document for the Carrizo Plains, as it is well over 10 miles from any urban area with a wastewater treatment plant. The proposed Ausra plant in the county currently plans to go to a deep aquifer with poor water quality. The upper aquifer has been identified as being in a state of overdraft.
- 5) With regards to transmission capacity, please clarify if the existing capacity of the Morro Bay and Diablo power plant lines (which go through the Carrizo Plains) have the capacity to support all of the estimated renewable power generation (6,452 MW), or if substantial upgrades will eventually be needed to support this amount of power;
- 6) It appears this report is considering 76 projects (proxy and pre-identified projects) within the Central Coast area (SLO & SB Counties); based on the energy cost graphs and Appendix D (Project Characteristics) it appears about 22 are for solar power within the north and south Carrizo areas; the county is aware of only three; furthermore, per appendix D, it appears all are identified as "solar thermal", which does not appear correct; Appendix C (Transmission Owner Interconnection Queue), which lists six solar projects, seems more in line with what the county is aware of; however, even these numbers do not appear to correspond with the three known projects (Optisolar/Topaz (PV) = 550 MW, Ausra/Carrizo (Thermal) = 177 MW, SunPower/High Plains (PV) = 250 MW) and the six total more than what is currently being proposed; would it be possible to provide the county a more detailed list of those projects used to generate this information, including if any of the non-CREZ projects are within SLO County?
- 7) The main renewable energy power sources cited in the RETI report are not predictable or "dispatchable" power sources for certain peak demand needs (i.e., only generate energy when the sun is shining or the wind is blowing, etc.) unlike fossil fuels and nuclear, and would appear likely to require storage of this energy within the Grid system once the amount of renewables exceeds a certain percentage of the overall power generation (as little as 10%, per Maria Skyllas-Kazacos, an electro-chemistry engineer and professor at the University of New South Wales). With efforts being made to increase the amount of renewables as a part of the industry's portfolio, it would appear appropriate to discuss this issue in the RETI document to better assess the need for on-site storage (e.g., battery) for individual power plants, or if separate facilities need to be considered or integrated into the overall assessment of renewable power. This would certainly be valuable as the county conduct's individual environmental analysis for each facility.

We look forward to your response on these items. Please also keep us informed of subsequent documents completed as well as any public meetings, webinar's or public hearings relating to this effort.

We also have many County GIS layers that can be made available upon request as you further analyze our area. Should you have any questions, please feel free to contact me ([805]781-5452; jdmckenzie@co.slo.ca.us).

Sincerely,

John McKenzie

Senior Environmental Planner

